

EXHIBIT 4

From: [Matthias Kamber](#)
To: [Seeve, Brian](#); anant.saraswat@wolfgreenfield.com
Cc: mvella@princetonobel.com
Subject: RE: Dr. Khatri's Review of Source Code
Date: Friday, July 9, 2021 2:39:48 PM

Brian,

We are in the process of collecting the “tc_top” module (and trying to identify if something else might also be warranted) for inspection on the source code computer, which we plan to have done by the end of next week. That’s not to say that we concede that the module is relevant to the issues in this case, and we certainly did not withhold it; rather, we produced what we thought was accused based on the infringement contentions. How the modules we produced are “instantiated”—if that’s even the right way of thinking about it in the context of System Verilog files—does not seem particularly relevant to the infringement inquiry, but we will make the requested code available to avoid an unnecessary dispute. That said, we do not see this as a basis for holding open or reopening any scheduled depositions, particularly because the code has been available since November 6th and was inspected by Singular’s counsel and consulting expert earlier this year.

Matthias

From: Seeve, Brian <bseeve@princetonobel.com>
Sent: Thursday, July 8, 2021 8:04 PM
To: Matthias Kamber <MKamber@keker.com>; anant.saraswat@wolfgreenfield.com
Cc: mvella@princetonobel.com
Subject: Dr. Khatri's Review of Source Code

[EXTERNAL]

Matthias –

Based on Dr. Khatri’s review of the source code today, we have reason to believe that source code related to the structure and operation of the Accused Products has not been made available for review. Dr. Khatri will suspend his review until this missing source code is made available.

Specifically, Dr. Khatri has identified modules called “mxu_top”, “fp_vpu”, and “fp_cs” within Google’s source code, which appear to correspond to the MXU, VPU, and Core Sequencer, respectively, all of which are referenced in Singular’s infringement contentions as components of the Accused TPU boards.

However, the source code available on the review computer does not include any code that links these three discrete components together. More precisely, the code available for review includes code that defines the “mxu_top” “fp_vpu” and “fp_cs” modules, but does not include any code that instantiates these three modules.

Based on his review of Google's code and documents, Dr. Khatri has reason to believe that such code exists. For example, the source code on the review computer includes comments that mention a module called "tc_top," but Google has not provided any source code corresponding to a "tc_top" module.

If the source code corresponding to the Accused Products includes files that instantiate the "mxu_top", "fp_vpu", and/or "fp_cs," modules, please load those files onto the source code review computer, as they are clearly relevant to the operation of the accused products. Dr. Khatri is available to return to Kecker's offices to review this additional code during the week of July 19th.

Otherwise, Singular will assume that Google has chosen to withhold portions of the source code corresponding to the structure and operation of the Accused Products. Specifically, that Google has chosen to withhold the portions of the source code that define the linkage between the MXU, the VPU, and the Core Sequencer, which is described in numerous microarchitecture specifications and diagrams produced by Google, and even in Google's own public documents.

Please let us know by Friday July 9th whether Google intends to make any additional source code available for review.

Regards,

- Brian

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